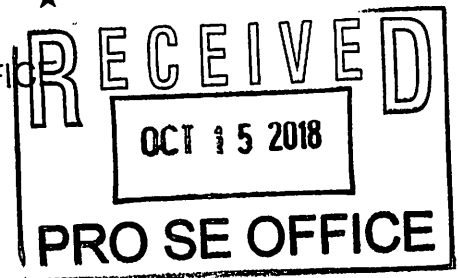


ORIGINAL

FILED
IN CLERK'S OFFICE
US DISTRICT COURT E.D.N.Y.

★ OCT 15 2018 ★

BROOKLYN OFFICE



**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA,

Plaintiff.

v.

MOSHE LAX, individually, as an executor of the Chaim Lax Estate, as a trustee of the Chaim Lax Family Trust, and as a trustee of the GAMA Trust; ZLATY SCHWARTZ, individually, as executor of the Chaim Lax Estate, as trustee of the Chaim Lax Family Trust; SHAINDY LAX; JUDITH LAX; J.L., a minor; 299 HEWES STREET REALTY CORP; 307 HEWES STREET REALTY CORP; JBAM REALTY LLC, a/k/a JBAM REALTY 2 LLC; BEN ZION JACOBOWITZ; TONY JACOBOWITZ; SL HOLDINGS I, LLC; SL HOLDINGS II, LLC; SL HOLDINGS III, LLC; SL HOLDINGS IV, LLC; SL HOLDINGS V, LLC; DIAMOND DYNAMICS LLC; KGK JEWELRY LLC; CONGREGATION BAIS YEHUDAH D'GANITCH; and LX HOLDINGS LLC.

Defendants.

No.: 1:18-cv-04061

ILG-PK

ANSWER AND AFFIRMATIVE DEFENSES

Defendant Moshe Lax , hereby undersigned acting as pro se answers and affirmative defends to the complaint of the plaintiff, the United States of America, alleges and states the following

Moshe Lax denies any allegations by the plaintiff of fraudulent conveyances and any scheme to defraud the United States of America from owed taxes.

Moshe Lax was not involved in any senior level management of his late father Chaim Lax's affairs prior to his illness/ death.

Moshe Lax did not know, understand or have any proper knowledge of the trusts that were created by the attorneys of chaim Lax

Moshe Lax did not have any involvement in chaim Lax's purchases of land to develop for condos etc , loans etc.

Moshe Lax was pursuing smaller enterpeneurial projects while devoting most of of his time to academic studies and publishing. Moshe authored and published two books on Jewish philosophy and Law , Studies on ADHD and memory in collaboration with UC of Santa Barbara and more.

In addition Moshe Lax was pre occupied and dealing with serious illness in his immediate family for a few years.

Moshe Lax was not involved in the management of Dynamic Diamonds LLC , its loans , its taxes etc.

At Chaims death, Moshe Lax in his grief and overwhelm had no other way of dealing and handling this complexes estate and businesses ,other then to delegate and hire the most reputable law firms and accountants to guide him on what's right and how to proceed.

Porzio , Bromberg and Newman was hired and led the process and brought in as forensic accountants the reputable Accounting firm JH COHN, based on opinion letters from Chaim Lax's prominent attorneys and all the research they set out the guide how to move forward in what was an extremely overwhelming experience for moshe lax in the midst of 2008 Great Recession crash.

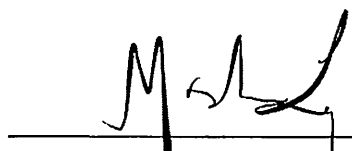
At a meeting on Aug 2nd 2018 at the New Jersey offices of Porzio , Bromberg and Newman , Mr. Warren Marten reiterated to me that they did everything what was right in, reason, process and procedure of the law for Dynamic Diamond LLC etc. and that they're willing to defend it for they positively know it's right and just.

Moshe Lax currently has the misfortune of being out of a job and left with no incoming funds to hire the attorneys to defend these allegations.

I would like to reiterate that every claim of a scheme and fraud is built on a mistaken narrative and assumption of my intent and underlying reasons of the business activities where I actually for this very reason of making sure all is done properly , I delegated , paid a lot of money for prominent firms and consultants to guide me and set up everything to the utmost integrity and highest standards of the law.

I therefore ask the court to dismiss the complaint and request for relief of the United States of America v. Moshe Lax

Respectfully Submitted

A handwritten signature in black ink, appearing to read 'Moshe Lax', is written over a horizontal line.

Moshe Lax October 15, 2018